

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

**ANGEL DAVID MORALES
VALLELLANES,
Plaintiff,**

v.

**JOHN POTTER, UNITED STATES
POSTMASTER GENERAL, ET ALS.,
Defendants.**

CIVIL NO. 97-2459 (GAG)

**DAMAGES BASED ON
RETALIATION AND
DISCRIMINATION; PROHIBITED
PERSONNEL PRACTICES;
UNFAIR LABOR PRACTICES;
BREACH OF COLLECTIVE
BARGAINING AGREEMENT**

**TRIAL BY JURY IS HEREBY
REQUESTED**

REPLY TO MOTION IN COMPLIANCE

COMES NOW, plaintiff Angel David Morales-Vallellanes through his legal counsel and very respectfully inform this Honorable Court:

1. The undersigned attorney was consulted as to the proposed schedule and the same as informed does not represent conflict at all.
2. Plaintiff objection is to the twelve (12) depositions to be taken by defendant after the discovery date concluded back on September 2005.
3. During the status conference an objection was presented by the undersigned and the Honorable Court limited the depositions to be taken by defendant to four (4).
4. The determination to limit the depositions to four (4) was made by the Honorable Court after the undersigned objection to prevent a reopening of the discovery. Plaintiff objection was based on this Honorable Court order preventing this party further discovery back on September 2005.

WHEREFORE, it is respectfully requested from this Honorable Court an order to

limit defendants take of depositions to four (4) otherwise it will mean a reopening of the discovery.

RESPECTFULLY SUBMITTED.

I HEREBY CERTIFY that on May 12th, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: **Fidel A. Sevillano-Del Río, Esq.**, Assistant U.S. Attorney, Federico Degetau Federal Build., 150 Carlos Chardón Av., Hato Rey, Puerto Rico 00918.

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